Mitigation Monitoring and Reporting

The Mitigation Monitoring and Reporting Program (MMRP) is a CEQA-mandated outcome of the EIR process undertaken for the proposed project. The results of the environmental analyses, including proposed mitigation measures, are documented in the Final EIR for the proposed project.

CEQA requires that agencies adopting EIRs take affirmative steps to determine that approved mitigation measures are implemented subsequent to project approval.

Effective January 1, 1989, CEQA was amended to add Section 21081.6, implementing Assembly Bill (AB) 3180. As part of CEQA (state-mandated) environmental review procedures, Section 21081.6 requires a public agency to adopt a monitoring and reporting program for assessing and ensuring efficacy of any mitigation measures applied to the proposed project. Specifically, the lead or responsible agency must adopt a reporting or monitoring program for mitigation measures incorporated into a project or imposed as conditions of approval. The program must be designed to ensure compliance during project implementation. As stated in Public Resources Code, Section 21081.6 (a) (1):

> "The public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation. For those changes which have been required or incorporated into the project at the request of a responsible agency or a public agency having jurisdiction by law over natural resources affected by the project, that agency shall, if so requested by the lead agency or a responsible agency, prepare and submit a proposed reporting or monitoring program."

AB 3180 provides general guidelines for implementing monitoring and reporting programs (MMRP). Specific reporting and/or monitoring requirements, to be enforced during project implementation, shall be defined prior to final approval of the proposal by the responsible decision maker(s). In response to established CEQA requirements and those of AB 3180 (Public Resources Code Section 21000 et seq.), the proposed MMRP for the Malibu Lagoon Restoration and Enhancement Plan shall be submitted for consideration by the decision makers prior to completion of the environmental review process.

Table 1 is the final Mitigation Monitoring and Reporting matrix. The table lists each of the mitigation measures proposed in the EIR and specifies the following monitoring requirements for each:

- Party Responsible for Implementation of Mitigation,
- Implementation Phase,
- Party Responsible for Monitoring Activity,
- Monitoring Activity,
- Monitoring Period,
- Monitoring Frequency, and
- Outside Agency Coordination.

Table 1. Mitigation Monitoring and Reporting

MITIGATION MEASURE	IMPLEMENTATION	MONITORING	OUTSIDE AGENCY COORDINATION
BIO-1 Southern Steelhead Trout. Construction and lagoon excavation may occur during steelhead migration. In order to avoid direct impacts to steelhead, wetland excavation shall occur such that grading activity and equipment are separated from surface connections to the existing lagoon by earthen berms. Groundwater that may accumulate in these excavated areas shall be returned to the lagoon, via pump, in a manner that eliminates sediment and the potential to disturb lagoon salinity stratification, substrate, and temperature. In certain circumstances, physical or biological constraints may make it infeasible for excavations to be separated by earthen berms from the main body of the existing lagoon. In these situations, impacts shall be avoided by separating construction activity from the main lagoon by the temporary placement of a cofferdam wall, silt curtains, and block nets or a combination of similar tools. In the event that water must be pumped from these areas during construction, it shall be returned to the lagoon, via pump, in a manner that eliminates sediment and the potential to disturb lagoon salinity stratification, substrate, and temperature. Fish salvage efforts shall be conducted for any surface water that must be separated from the main lagoon. After construction, the area shall be reflooded in a manner that minimizes disturbance of the lagoon salinity stratification and substrate and the release of sediment.	Responsible Party(s) • State Parks Phase • Phase 2 Construction	Responsible Party(s) • State Parks Activity • Retain USFWS-approved biologist to monitor lagoon earthwork and make determination about need for further monitoring as construction continues. Monitoring Period • Phase 2 Construction Frequency • Once prior to initial lagoon earthwork in goby habitat area and continuing as determined necessary by biologist.	Potential coordination with CDFG, NOAA/NMFS, and USFWS

	MITIGATION MEASURE	IMPLEMENTATION	MONITORING	OUTSIDE AGENCY COORDINATION
	Reinundation of the western lagoon may provide refuge areas for fish during construction activities in the main lagoon. Block netting and barriers shall be used to exclude adult gobies, migratory steelhead, and other fish from the work areas. On-site monitoring by a USFWS-approved fisheries biologist would be conducted during any channel or bank disturbance. Pages 100 and 101 of the Final Alternatives Analysis prepared by Moffatt and Nichol (March 2005) outline a possible construction sequence in more detail that incorporates several of these ideas.			
BIO-2	Tidewater Goby. Construction of the restoration project shall be timed to minimize disturbance of the western shoreline of the main lagoon when larval tidewater gobies are using the near-shore habitat. In order to avoid direct impacts to gobies, wetland excavation shall occur such that grading activity and equipment are separated from surface connections to the existing lagoon by earthen berms. Groundwater that may accumulate in these excavated areas shall be returned to the lagoon, via pump, in a manner that eliminates sediment and the potential to disturb lagoon salinity stratification, substrate, and temperature. In certain circumstances, physical or biological constraints may make it infeasible for excavations to be separated by earthen berms from the main body of the existing lagoon. In these situations, impacts to gobies shall be avoided by separating construction activity from the main lagoon by the temporary placement of a cofferdam wall, silt curtains, and block nets or a combination of similar tools. In the event that water must be removed from these areas during construction, it	Responsible Party(s) • State Parks Phase • Phase 2 Construction	Responsible Party(s) • State Parks Activity • Retain USFWS-approved biologist to monitor lagoon earthwork and make determination about need for further monitoring as construction continues. Monitoring Period • Phase 2 Construction Frequency • Once prior to initial lagoon earthwork in goby habitat area and continuing as determined necessary by biologist.	Potential coordination with CDFG and USFWS

MITIGATION MEASURE		IMPLEMENTATION	MONITORING	OUTSIDE AGENCY COORDINATION
	shall be returned to the lagoon, via pump, in a manner that eliminates sediment and the potential to disturb lagoon salinity stratification, substrate, and temperature. Fish salvage efforts shall be conducted for any surface water that must be separated from the main lagoon. After construction, the area shall be reflooded in a manner that minimizes disturbance of the lagoon salinity stratification and substrate and the release of sediment. Construction in the main lagoon shall occur outside of the May 1 through November 1 breeding season for the tidewater gobies. Reinundation of the western lagoon may provide refuge areas for fish during construction activities in the main lagoon. Block netting shall be used to exclude adult gobies, migratory steelhead, and other fish from the work areas. On-site monitoring by a USFWS approved fisheries biologist would be conducted during any channel or bank disturbance. Pages 100-101 of the Final Alternatives Analysis prepared by Moffatt and Nichol (March 2005) outlines a possible construction sequence in more detail that incorporates many of these ideas.			
BIO-3	California Brown Pelican. On-site monitoring by a USFWS-approved biologist would be conducted during any disturbance within suitable/occupied habitat for this species.	Responsible Party(s) • State Parks Phase • All Construction	Responsible Party(s) • State Parks Activity • Retain USFWS-approved biologist to monitor lagoon earthwork and make determination about need for further monitoring as construction continues.	Potential coordination with CDFG and USFWS

MITIGATION MEASURE		IMPLEMENTATION	MONITORING	OUTSIDE AGENCY COORDINATION
			Monitoring Period • All Construction Frequency • Once during initial lagoon earthwork and continuing as determined necessary by biologist.	
BIO-4	Western Snowy Plover. Schedule construction activities and ground disturbance in suitable/occupied habitat to avoid the western snowy plover breeding season from mid-March to August 30. On-site monitoring by a USFWS-approved biologist would be conducted during any disturbance within suitable/occupied habitat for this species.	Responsible Party(s) • State Parks Phase • All Construction	Responsible Party(s) • State Parks Activity • Retain USFWS-approved biologist to monitor lagoon earthwork and make determination about need for further monitoring as construction continues. Monitoring Period • All Construction Frequency • Once during initial lagoon earthwork and continuing as determined necessary by biologist.	Potential coordination with CDFG and USFWS
BIO-5	Heermann's Gull. On-site monitoring by a USFWS-approved biologist would be conducted during any disturbance within suitable/occupied habitat for this species.	Responsible Party(s) • State Parks Phase • All Construction	Responsible Party(s) • State Parks Activity • Retain USFWS-approved biologist to monitor lagoon earthwork and make determination about need for further monitoring as construction continues. Monitoring Period • All Construction Frequency • Once during initial lagoon earthwork and continuing as determined necessary by biologist..	Potential coordination with CDFG and USFWS

MITIGATION MEASURE		IMPLEMENTATION	MONITORING	OUTSIDE AGENCY COORDINATION
BIO-6	Elegant Tern. On-site monitoring by a USFWS-approved biologist would be conducted during any disturbance within suitable/occupied habitat for this species.	Responsible Party(s) • State Parks Phase • All Construction	Responsible Party(s) • State Parks Activity • Retain USFWS-approved biologist to monitor lagoon earthwork and make determination about need for further monitoring as construction continues. Monitoring Period • All Construction Frequency • Once during initial lagoon earthwork and continuing as determined necessary by biologist..	Potential coordination with CDFG and USFWS
BIO-7	California Least Tern. Schedule construction activities and ground disturbance to avoid the California least tern breeding season and post-breeding season foraging (July to August). On-site monitoring by a USFWS-approved biologist would be conducted during any disturbance within suitable/occupied habitat for this species.	Responsible Party(s) • State Parks Phase • All Construction	Responsible Party(s) • State Parks Activity • Retain USFWS-approved biologist to monitor lagoon earthwork and make determination about need for further monitoring as construction continues. Monitoring Period • All Construction Frequency • Once during initial lagoon earthwork and continuing as determined necessary by biologist..	Potential coordination with CDFG and USFWS

MITIGATION MEASURE	IMPLEMENTATION	MONITORING	OUTSIDE AGENCY COORDINATION
HYDRO-1: Maintenance of Stormwater System. Permeable tiles, drainage swales, pumps, pipelines, and any associated equipment must be maintained on a regular basis to ensure full functioning. Maintenance may include removal of fine sediments from tile gaps for proper infiltration and periodic sediment removal from drainage swales for capacity maintenance. The project manager will ensure that all components of the storm drainage system are maintained to design and manufacturer specifications on a regular basis.	Responsible Party(s) • State Parks Phase • Post-construction	Responsible Party(s) • State Parks Activity • Inspection and maintenance of permeable parking lot materials, drainage swales, and other stormwater components. Monitoring Period • Post-construction Frequency • Monthly, with increased frequency as needed during winter months and prior to anticipated storm events.	None.
HYDRO-2: Implement Best Management Practices to Control Discharge of Construction-Related Pollutants to Surface Waters. Because project construction will cover an area greater than 1 acre, a Storm Water Pollution Prevention Plan (SWPPP) will be prepared by the Lead Agency or its contractor as required by the regional water quality control board (RWQCB) under the National Pollutant Discharge Elimination System (NPDES) General Construction Permit. The SWPPP shall meet the requirements of the RWQCB as well as any City and County requirements. The SWPPP will identify best management practices (BMPs) to maintain water quality. The final selection and design of erosion and sediment controls shall be subject to approval by the Lead Agency. BMPs in the SWPPP may include, but is not limited to, the following elements:	Responsible Party(s) • State Parks Phase • Pre-construction; construction	Responsible Party(s) • State Parks Activity • Prepare SWPPP as indicated and implement BMPs as required. Monitoring Period • Construction Frequency • As specified for various BMPs	Regional Water Quality Control Board

MITIGATION MEASURE	IMPLEMENTATION	MONITORING	OUTSIDE AGENCY COORDINATION
• Temporary erosion control measures (such as silt fences, staked straw bales/wattles, silt/sediment basins and traps, check dams, geofabric, sandbag dikes, and temporary revegetation or other ground cover) will be employed for disturbed areas. • Earth dikes, drainage swales, and ditches shall be provided to intercept, divert, and convey surface runoff and sheet flow; prevent erosion; and reduce pollutant loading. Specific areas that may need such measures shall be identified on the construction drawings. • Roads used during construction shall be continuously swept and cleaned of accumulated earth and debris in the construction zone during project construction, particularly before predicted rainfall events. • Excavated materials deposited or stored on-site temporarily shall not be placed in or adjacent to open water channels and shall be wetted and covered as necessary to prevent runoff and erosion. • Oils, fuels, and other toxicants spilled or deposited near the project site shall be removed and disposed of according to applicable laws and regulations. • Establish grass or other vegetative cover over areas that have been disturbed by construction as soon as possible after disturbance to establish vegetative cover. This will reduce erosion by slowing runoff velocities, enhancing infiltration and transpiration, trapping sediment and other particulates, and protecting soil from raindrop impact.			

MITIGATION MEASURE	IMPLEMENTATION	MONITORING	OUTSIDE AGENCY COORDINATION
The Lead Agency and/or its contractors shall implement a monitoring program to verify BMP effectiveness. The monitoring program shall begin at the outset of construction and terminate upon completion of the project.			
HYDRO-3: Implement a Hazardous Material Spill Prevention Control and Countermeasure Plan. A Hazardous Material Spill Prevention Control and Countermeasure Plan would be prepared as part of the NPDES General Construction Permit to minimize the potential for, and effects from, spills of hazardous, toxic, or petroleum substances during construction of the project. This plan will describe storage procedures and construction site housekeeping practices and identify the parties responsible for monitoring and spill response. Routine inspections and monitoring of best management practices would ensure minimal impacts to the environment occur. Commonly practiced best management practices include use of containment devices for hazardous materials, training of construction staff regarding safety practices to reduce the chance for spills or accidents, and use of nontoxic substances where feasible. The plan also would describe actions required if a reportable spill occurs, such as which authorities to notify and the proper clean-up procedures. The Hazardous Material Spill Prevention Control and Countermeasure Plan would contain standards considered sufficiently protective such that significant adverse impacts on surface and groundwater quality would be avoided. The plan shall be completed before any construction activities begin.	Responsible Party(s) • State Parks Phase • Construction	Responsible Party(s) • State Parks Activity • Prepare and implement various components of Plan. Monitoring Period • Construction Frequency • As specified in approved plan.	Regional Water Quality Control Board

MITIGATION MEASURE	IMPLEMENTATION	MONITORING	OUTSIDE AGENCY COORDINATION
AQ-1: **Dust sweeping.** The construction area and vicinity (driveways, access roads, and staging areas) shall be swept with water sweepers on a daily basis or as necessary to ensure there is no visible dust.	Responsible Party(s) • State Parks Phase • All Construction	Responsible Party(s) • State Parks Activity • Ensure construction area is swept or watered regularly. Monitoring Period • All Construction Frequency • Daily	None
AQ-2 **Covering or watering of stockpiles.** On-site stockpiles of debris, dirt or rusty material shall be covered or watered at least twice daily to prevent fugitive dust. All unpaved roads, parking, and staging areas shall be watered at least once every two hours of active operations.	Responsible Party(s) • State Parks Phase • All Construction	Responsible Party(s) • State Parks Activity • Ensure all stockpiles are covered or watered regularly. Monitoring Period • All Construction Frequency • Daily	None
AQ-3 **Covering of Haul Trucks.** All haul trucks hauling soil, sand, and other loose materials shall either be covered or maintain two feet of freeboard.	Responsible Party(s) • State Parks Phase • All Construction	Responsible Party(s) • State Parks Activity • Monitor haul truck activity to ensure compliance. Monitoring Period • All Construction Frequency • Daily	None

MITIGATION MEASURE	IMPLEMENTATION	MONITORING	OUTSIDE AGENCY COORDINATION
CR-1 **Cultural Resources Testing in Area Adjacent to CA-LAN-264.** Cultural resources, including CA-LAN-264 and the historic Adamson House grounds and ancillary structures, will be avoided to the extent possible. The hydrology of the lagoon will not be changed such that the boathouse or grounds are at greater risk of flood or construction impacts. Cultural resources excavations will be undertaken prior to any ground-disturbing activities along the eastern bank of the main lagoon channel adjacent to CA-LAN-264 if any project-related earthwork occurs within 100 feet of the known boundary of CA-LAN-264. Test excavations shall not take place within the known boundaries of CA-LAN-264 but adjacent to the boundaries if project construction would require any ground-disturbing activities within 100 feet of the known site boundary. Because sensitivity is moderate to high for cultural resources, including human remains, to be present along this edge of the project area, a subsurface testing program should be implemented to identify if resources are present and evaluate potentially NRHP-eligible resources. This should be undertaken if any project related construction comes within 100 feet of the known boundary of CA-LAN-264 (See Dillon 1987:45). If subsurface testing identifies intact, significant archaeological resources within the project area that cannot be avoided, the project would have an adverse effect. Development of measures to mitigate adverse effects would be necessary and a Memorandum of Agreement would be required to complete Section 106 consultation.	Responsible Party(s) • State Parks Phase • Phase 2 Construction	Responsible Party(s) • State Parks Activity • Archaeological monitoring of earthwork Monitoring Period • Phase 2 Construction Frequency • Daily for any earthwork within 100 feet of known boundary of CA-LAN-264.	Native American Consultation; Possible SHPO

MITIGATION MEASURE	IMPLEMENTATION	MONITORING	OUTSIDE AGENCY COORDINATION
The preconstruction testing program should include, but need not be limited to: • development of a testing strategy to identify subsurface archaeological deposits, including further research on previous investigations and regarding previous lagoon excavations, in an effort to refine the scope of any field effort; • evaluation of significance and integrity of exposed archaeological deposits (according to the National Historic Preservation Act [NHPA], NRHP, and CRHR criteria) if present, in consultation with the State Historic Preservation Officer (SHPO); and • consultation with local Native Americans if prehistoric or ethnohistoric resources are identified. Upon identification of any significant prehistoric or historical archaeological resources, it will be necessary to avoid these resources during project development, or to formulate a treatment plan to mitigate adverse effects. A treatment plan, adopted within a Memorandum of Agreement, to be negotiated in consultation with the SHPO, would likely include the following: • an acceptable data recovery plan stating specific research goals and questions that are to be addressed if archaeological deposits are to be recovered, • postfield artifact processing and analysis; • report preparation in accordance with the guidelines of DPR, and • permanent curation of artifacts and documents in a repository consistent with the National Park Service guidelines for the			

	MITIGATION MEASURE	IMPLEMENTATION	MONITORING	OUTSIDE AGENCY COORDINATION
	curation of archaeological collections (36 Code of Federal Regulations [CFR79]). Feature recovery should employ standard archaeological excavation techniques. The testing and evaluation plan should be designed and implemented by a qualified Prehistorical Archaeologist, and if discoveries warrant, a qualified Historical Archaeologist. Both the testing and evaluation plan and the data recovery strategy should be developed in consultation with the project proponent and interested local Native American groups. It should state that Native American human remains will be treated in compliance with Health and Safety Code, Sections 7050.5, 8010, and 8011 and Public Resources Code, Section 5097.98. Given the potential for encountering Native American artifacts, a Native American should monitor all subsurface excavations.			
CR-2	Cultural Resources Monitoring in Area Adjacent to CA-LAN-264. Cultural resources monitoring is recommended during any ground disturbing activities along the eastern bank of the main lagoon channel adjacent to CA-LAN-264. Monitoring will be conducted if conditions allow for observation of spoils. Monitoring of dredging is probably not feasible given underwater activity would not be visible. However, underwater cultural sites may be present, and the material dredged will be inspected for the presence or absence of cultural material. The remainder of the project area may be monitored if notable cultural materials are discovered, or monitoring may be further limited if the monitoring area appears previously	Responsible Party(s) • State Parks Phase • Phase 2 Construction	Responsible Party(s) • State Parks Activity • Archaeological monitoring of earthwork Monitoring Period • Phase 2 Construction Frequency • Daily for any earthwork within 100 feet of known boundary of CA-LAN-264.	Native American Consultation; Possible SHPO

	MITIGATION MEASURE	IMPLEMENTATION	MONITORING	OUTSIDE AGENCY COORDINATION
	disturbed (as may be the case in areas where the California Department of Transportation (Caltrans) has deposited fill material and rip rap). If prehistoric cultural resources are discovered in this area during monitoring or other construction, all work will be halted in the vicinity of the archaeological discovery until a qualified archaeologist can visit the site of discovery and assess the significance of the archaeological discovery. Further treatment may be required, including site recordation, excavation, site evaluation, and data recovery.			
CR-3	**Stop Work If Cultural Resources Are Discovered during Ground-Disturbing Activities.** If buried cultural resources—such as flaked or ground stone, historic debris, building foundations, shellfish remains or non-human bone—are inadvertently discovered during ground-disturbing activities, work will stop in that area and within 100 feet of the find until a State Parks archaeologist or designee can assess the significance of the find and, if necessary, develop appropriate treatment measures. Treatment measures typically include: development of avoidance strategies, capping with fill material, or mitigation of impacts through data recovery programs, such as excavation or detailed documentation. Avoidance of cultural remains shall be the top priority at all times. If cultural resources are discovered during construction activities, the construction contractor will verify that work is halted until appropriate site-specific treatment measures, such as those listed above, are implemented.	Responsible Party(s) • State Parks Phase • Phase 2 Construction	Responsible Party(s) • State Parks Activity • Archaeological monitoring of earthwork Monitoring Period • Phase 2 Construction Frequency • Daily for any earthwork within 100 feet of known boundary of CA-LAN-264.	Native American Consultation; Possible SHPO

MITIGATION MEASURE		IMPLEMENTATION	MONITORING	OUTSIDE AGENCY COORDINATION
CR-4	**Comply with State Laws Pertaining to the Discovery of Human Remains.** If human remains of Native American origin are discovered during ground-disturbing activities, it is necessary to comply with state laws relating to the disposition of Native American burials that fall within the jurisdiction of the California Native American Heritage Commission (Public Resources Code Section 5097). Construction work shall not continue within 100 feet of a location where human skeletal remains are found. According to California Health and Safety Code, six or more human burials at one location constitute a cemetery (Section 8100), and disturbance of Native American cemeteries is a felony (Section 7052). Section 7050.5 requires that excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If the remains are determined to be Native American, the coroner must contact the California Native American Heritage Commission to determine the most likely living descendant(s). The most likely living descendant shall determine the most appropriate means of treating the human remains and any associated grave artifacts, and shall oversee disposition of the human remains and associated artifacts by the project archaeologists. This impact would be significant, but implementation of the mitigation measures above would reduce this impact to a less-than-significant level.	Responsible Party(s) • State Parks Phase • Phase 2 Construction	Responsible Party(s) • State Parks Activity • Archaeological monitoring of earthwork Monitoring Period • Phase 2 Construction Frequency • Daily for any earthwork within 100 feet of known boundary of CA-LAN-264.	Native American Consultation; Possible SHPO

MITIGATION MEASURE		IMPLEMENTATION	MONITORING	OUTSIDE AGENCY COORDINATION
N-1	Use of Mufflers. Construction contracts shall specify that all construction equipment shall be equipped with mufflers and other suitable noise attenuation devices.	Responsible Party(s) • State Parks Phase • All Construction	Responsible Party(s) • State Parks Activity • Ensure use of mufflers and other attenuation devices. Monitoring Period • All Construction Frequency • Daily	None
N-2	Notice of Construction Schedule and Noise "Hotline." All residential units located within 500 feet of the construction site shall be sent a notice regarding the construction schedule of the proposed project. A clearly legible sign shall also be posted at the construction site. All notices and the signs shall indicate the expected dates and duration of construction activities, as well as provide a telephone number that residents can call to resolve any concerns about construction noise. The Lead Agency shall be responsible for responding to any local complaints about construction noise. The Lead Agency (or designee) would determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and would be required to implement reasonable measures such that the complaint is resolved.	Responsible Party(s) • State Parks Phase • All Construction	Responsible Party(s) • State Parks Activity • Send notices, post sign, and designate a community liaison and phone number to respond to any noise concerns. Monitoring Period • All Construction Frequency • Daily	None
N-3	Limits of hours of construction. Pursuant to the Noise Control Ordinance of the City of Malibu, Section 8.24.050G, construction activities shall be prohibited during the hours between 7:00 p.m. and 7:00 a.m. during the weekdays and any time on	Responsible Party(s) • State Parks Phase • All Construction	Responsible Party(s) • State Parks Activity • Ensure adherence to construction hours.	None

MITIGATION MEASURE	IMPLEMENTATION	MONITORING	OUTSIDE AGENCY COORDINATION
Sundays or holidays. All construction related to the proposed project would take place between the hours defined by the Ordinance. Additionally, construction activities shall be coordinated with Adamson House staff to ensure that potentially disturbing construction activities do no occur during planned events at the Adamson House, such as Saturday weddings.		Monitoring Period • All Construction Frequency • Daily	